

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

JAMES ONEIL BEALE

Case No. 12-37076-KRH  
Chapter 13

Debtor(s)

**DEBTOR'S RESPONSE TO NOTICE OF DEFAULT**

Now comes the Debtor (s) in this matter, by counsel, and as and for his Response to the Notice of Default by Union First Market Bank on 12/23/2013, says as follows:

1. The notice sent by Michael A. Condyles on behalf of Union First Market Bank states that the amount of the default is \$942.46.
2. Debtor received correspondence from Union First Market Bank dated 9/17/2013, stating that his mortgage payment would be changing effective 12/1/2013. The amount of the new mortgage payment was to be \$569.48 in principal and interest and \$141.02 in escrow for a total payment of \$710.50. The correct amount of debtor's default should be \$710.50.
3. Debtor has cured the default of \$710.50.

WHEREFORE, Debtor respectfully moves the Court that relief not be granted pursuant to the Notice of Default.

Respectfully submitted:  
JAMES ONEIL BEALE

BY: /s/ Jessica L. Fellows  
Counsel

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Certificate of Service

I certify that on 1/6/14, I transmitted a true copy of the foregoing electronically through the Court's CM/ECF system to Jeremy Williams counsel for Union First Market Bank.

/s/ Jessica L. Fellows

Jessica L. Fellows